

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:22-MD-03036-KDB**

**IN RE: GARDASIL PRODUCTS LIABILITY
LITIGATION**

MDL No. 3036

**THIS DOCUMENT RELATES TO
ALL BELLWETHER CASES**

**DECLARATION OF ALLYSON M. JULIEN IN SUPPORT OF
DEFENDANTS' MOTION TO EXCLUDE TESTIMONY AND OPINIONS
OF PLAINTIFFS' EXPERT MARTIN KULLDORFF, PH.D.**

I, Allyson M. Julien, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice in the State of Illinois and admitted to appear as counsel before this Court. I am a partner at the law firm of Goldman Ismail Tomaselli Brennan & Baum LLP, counsel of record for defendants Merck & Co., Inc., and Merck, Sharp & Dohme LLC (together, "Merck") in the above-captioned matter.

2. I submit this declaration in support of Defendants' Motion to Exclude Testimony and Opinions of Plaintiffs' Expert Martin Kulldorff, Ph.D.

3. I have attached an index with true-and-correct copies of materials cited in the brief in support of Merck's motion. These materials include the following:

- a. Materials cited by the plaintiffs' experts in their reports.
- b. Materials from government health-care agencies. These materials are publicly available.

- c. Scientific and medical articles and studies. These materials were published in periodicals and many were used as exhibits in various depositions.
- d. The report and deposition transcript of plaintiffs' experts, Martin Kuldorff, Ph.D.; and Lucjia Tomljenovic, Ph.D.

Executed on the 6th day of January, 2025, in Chicago, Illinois.


Allyson M. Julien